



October 19, 2011

The Honorable Julius Genachowski
FCC Chairman
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Dear Sir,

I am the Founder of LCR Telecommunication, LLC, a switchless long distance reseller providing services to several thousand small business and residential customers across the US.

We are pleased to see the Commission take an active interest in protecting landline users from cramming. We support this direction strongly. That said, we know that third-party billing provides significant value to our customers, and we are confident that a solution to cramming exists. We believe that such a solution can and should consist of reasonable measures that does not lead to the eradication of third-party billing.

Thousands of businesses realize the benefits of third-party billing -- such as the opportunity to consolidate charges for services onto a single bill while reducing administrative costs. Additionally, millions of consumers each year have the option to acquire a great number of services at more competitive rates -- with a billing option that does not require them to open additional lines of credit or manage yet another bill.

Companies like ours have been able to offer customers (both business and residential) a flexible and hassle-free billing option that saves time and money, as a result of third-party billing. This has also allowed us as a small business to remain competitive in a challenging market, surrounded by Goliaths. Eliminating third-party billing would detrimental to businesses such as ours and those businesses we serve.

LCR appreciates your consideration in this regard and urges you to consider the financial impact that this could have across the country.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Martin J. Tibbitts', is written over a light blue horizontal line.

Martin Jay Tibbitts